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Attorneys for Defendant, Bank of America, N.A.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ALEXIS GURSHIN, Plaintiff,

v.

BANK OF AMERICA, NATIONAL
ASSOCIATION; DOES I through X, and
ROE BUSINESS ENTITIES I through X,
inclusive, Defendant.

Case No.: 2:15-cv-00323-GMN-VCF

**JOINT STIPULATION TO EXTEND
PARTIES' DEADLINES TO RESPOND
TO PARTIES' RESPECTIVE
OBJECTIONS TO MAGISTRATE
JUDGE'S ORDER ON MOTION TO
DEEM REQUESTS ADMITTED [DKT.
130] UNDER FED. R. CIV. P. 72(A)
AND LOCAL RULE IB 3-1**

(First Request)

Plaintiff Alexis Gurshin (“Plaintiff”) and Defendant, Bank of America (“Defendant”), through their respective undersigned Counsel, hereby stipulate to request this Court for a seven (7) day extension (to February 10, 2017) of two filing deadlines:

- Defendant's response to Plaintiff Alexis Gurshin's Objection to Magistrate Judge's 1/6/2013 Order (ECF No. 130) Denying Additional Deposition Time for FRCP 30(b)(6) Bank Deponent/Designee on Subject No. 6 (Jennifer Miller) (ECF

1 No. 133); and,

- 2 • Plaintiff's response to Defendant Bank of America, N.A.'s Objections to
3 Magistrate Judge's Order on Motion to Deem Requests Admitted [DKT. No. 130]
4 Under Fed. R. Civ. P. 72(A) and Local Rule 1B 3-1 (ECF No. 132)

5 Under Fed. R. Civ. P. 72(A) and Local Rule 3-1, the deadlines for the parties to file
6 respond to each other's Objections is currently February 3, 2017. The request is being made
7 because:

- 8 1. Plaintiff's Counsel has a settlement conference in an unrelated matter, scheduled to
9 convene on the current response deadline of February 3, 2017, which requires
10 substantive preparation and which will interfere with Plaintiff's Counsel's
11 availability to respond to Defendant's filed Objection.
- 12 2. Defendant's Counsel has graciously agreed to extend the professional courtesy of an
13 extension requested by Plaintiff's Counsel and to make it mutual.

14
15 Respectfully submitted,
16 Dated: February 2, 2017
17 Gilbert & England Law Firm

18 By: /s/
19 Kathleen J. England
610 South Ninth Street
Las Vegas, Nevada 89101-7013
20 Attorneys for Plaintiff,
ALEXIS GURSHIN

Dated: February 2, 2017
McGuireWoods LLP

By: /s/
Bethany A. Pelliconi, *Pro Hac Vice*
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Attorneys for Defendant,
BANK OF AMERICA, N.A.

21
22 IT IS SO ORDERED.
23
24 Dated: February 10, 2017
25
26 UNITED STATES DISTRICT JUDGE
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